UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

Reply To
Attn Of: ECO-088

JUL 19 2002

02-030-NPS

Rick VanderVoet, Monument Manager
Bureau of Land Management,(BLM)
Shoshone Field Office
PO Box 2-B
Shoshone, ID 83352

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RECEIVED

James Morris, CRMO Superintendent
National Park Service (NPS)
PO Box 29
Arco, ID 83213

Dear Mr. VanderVoet and Mr. Morris:

The U.S. Environmental Protection Agency (EPA) has reviewed the Federal Register Notice of Intent (NOI) to prepare an environmental impact statement (EIS) for the proposed **Craters of the Moon National Monument (CRMO), Land Use Plan**. Our review of the NOI was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

Section 309 specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Although our Section 309 and NEPA reviews are independent, we conduct both at the same time. Our review considers not only the impact to the environment, but also the adequacy of the document to meet the requirements of NEPA. To avoid major revisions after the draft EIS is issued, we offer these comments early in the NEPA process to help improve the proposed project and ensure that a good NEPA document is developed. A good EIS should adequately address purpose and need for the proposed activity, set forth the environmental impacts of the proposed project and all its alternatives, and discuss significant issues. Please refer to the attached information, *EPA's Section 309 Review: The Clean Air Act and NEPA*, for further explanation on our EIS review responsibility.

Through the Presidential Proclamation 7373, the CRMO was greatly expanded "to assure protection of the entire Great Rift volcanic zone and associated lava features." The CRMO's basaltic volcanism features are nationally significant. In addition, the CRMO contains undisturbed sage-brush steppe communities within isolated vegetation islands surrounded by lava. These relic vegetation stands, called kipukas, form essential habitat for sensitive species that is often found lacking within the surrounding Snake River Plain.

Bureau of Land Management and the National Park Service are in a unique situation, as co-managers, to manage and protect this national treasure. Our major concerns related to the proposed CRMO, Land Use Plan are:

- The direct, indirect, and cumulative impacts to streams and riparian areas – For example, the proposed project has the potential to alter stream discharge, and degrade riparian areas and water quality.
- Impacts to soil quality – The proposed project has the potential,to impact long-term soil productivity (soil quality) through disturbances and changes in organic matter levels.
- Threatened or endangered species – The proposed project may impact federally listed or candidate species and including their habitats.
- Wildlife habitat and habitat connectivity – The proposed project should disclose if or how wildlife habitat or migration corridors might be impacted.
- Recreation and accessibility – The DEIS should disclose management of recreational and accessibility opportunities in the project area.
- Prescribed wildfires – The proposed management plan should disclose potential impacts from prescribed fires in the project area.
- Air Quality – The DEIS should disclose the elements of a smoke management plan for the project area.
- Livestock grazing – Since grazing will continue within the CRMO, the DEIS should elements of sustainable rangeland management and disclose impacts associated with existing and proposed livestock grazing activities within project areas.
- Invasive and noxious weeds – Proposed project should disclose efforts towards restoration of native habitat disrupted by the colonization and establishment of noxious weeds within project area.
- Hunting activities – Since hunting privileges will continue in the Monument, the DEIS should disclose long-term management of target species and their habitat.
- Historic resources, treaty rights, and privileges – Proposed project development may affect historical or traditional cultural places of importance to the area's tribal community.
- Effective public participation – The DEIS should disclose what efforts were initiated to ensure effective public participation.

We appreciate the opportunity to participate early in the scoping process. We are available to discuss issues or answer questions that arise while you develop the draft EIS. Should you have any questions regarding our comments, please contact me at (206) 553-4423 or at connor.tom@epa.gov.

Sincerely,

Tom Connor

Tom Connor, Environmental Specialist

Additional Environmental Protection Agency (EPA) Detailed Scoping Comments on the Fire, Fuels, and Vegetation Management Plan

Purpose and Need

We suggest writing a short, yet direct, Purpose and Need statement that clearly states what the driving factor is for the project. The Council on Environmental Quality (CEQ), through its regulation (§ 1502.13), provides assistance in proposing that the Purpose and Need statement should disclose the underlying purpose of this management plan (MP). Make it about one to two sentences long. Then follow it with more in-depth discussion. Avoid putting in the Purpose and Need Statement other objectives you want to accomplish. Instead, discuss these other objectives later in the Purpose and Need section. For example, the Purpose and Need for this cooperative project between BLM and NPS may be to manage and restore public lands within the Craters of the Moon National Monument (CRMO). If both federal project leads intend to also improve livestock forage and habitat, improve recreational opportunities, and preserve relic sage-brush steppe habitat in the CRMO, then it would be more accurate to characterize these as other proposed activities and not include them in the Purpose and Need statement.

Description of Impacts

We strongly encourage that the Draft Environmental Impact Statement (DEIS) quantify values where possible when predicting impacts to the environment and discuss the significance of those values in terms of how the environment will be affected. Describing impacts as low, medium, or high, for example, is not very meaningful. Ideally impacts should be quantified and compared against a standard or threshold. For example, water quality of an affected stream could be compared to the water quality standards.

Water Quality

303(d) Listed Waters

One of EPA's primary concerns is to prevent the degradation of water quality. Section 303(d) of the Clean Water Act (CWA) requires the state of Idaho identify those waterbodies which are not meeting or not likely to meet State water quality standards. The EIS must disclose which waterbodies may be impacted by the project, the nature of the potential impacts, and the specific pollutants likely to impact those waters. It should also report those water bodies potentially affected by the project that are listed on the State's current 303(d) list and whether Idaho Department of Environmental Quality (DEQ) has developed a TMDL for the waterbodies and the pollutants of concern. If a water restoration plan (Total Maximum Daily Load) has not been established which applies to a stream on the 303(d) list, then in the interim until one is established, it must be demonstrated that there will be

no net degradation of water quality. This should be demonstrated by doing a watershed analysis. Also, the DEIS must identify other waterbodies [not just those that are listed under Section 303(d)] likely to be impacted by the project, the nature of the potential impacts, and the specific pollutants likely to impact those waters.

Best Management Practices (BMPs)

Predicting water quality impacts from nonpoint source activities and the efficacy of BMPs in preventing those impacts is an imprecise science. Challenges include predicting water quality degradation from a proposed activity, designing appropriate BMPs, and making the BMPs work in the field. Therefore, the effectiveness of the BMP should be verified. One way is to use monitoring information on BMPs employed elsewhere under similar circumstances. Finally, water quality should be monitored to determine the adequacy of BMPs and for future remediation work if BMPs are found later to be inadequate.

Source Water Assessment and Protection (SWAP)

Public drinking water supplies and/or their source areas are often found on lands under federal management. Activities such as timber harvesting, road building, weed/insect control, grazing, and recreation may impact the water quality of waters that serve as the sources of drinking water for downstream communities. The SWAP provisions of the 1996 amendments to the Safe Drinking Water Act (SDWA) impose certain obligations on federal land management agencies. Under the SWAP requirements, federal land management agencies that manage land that serves as source water areas will need to participate with the states and local communities in the delineation of the source water area, the inventory of all potential sources of contamination, and in the protection of these source water areas.

If you should discover that there are public drinking water supplies in the project area, then you should disclose this information and how you intend to protect those source waters under each alternative. In any case, you should discuss the SWAP provisions of the SDWA as outlined above, what you are doing to meet your obligations under SWAP, and whether there are any issues with SWAP from this project.

Vegetation Management

Unfortunately, noxious weeds have established themselves nationally across thousands of acres of BLM land. Currently, BLM is participating with state and local governments in establishing Cooperative Weed Management Areas. These Areas will utilize local, state and federal resources to inventory and treat weed infestations on public and private lands. While the briefing package for the proposed project does mention mechanical and chemical methods towards weed management, EPA strongly encourages that the DEIS incorporates proven strategies of an integrated weed management program.

EPA endorses the concept of an integrated weed management program for several reasons. Important among these reasons are:

1) Uncertainties. Despite the substantial amount of scientific information that EPA reviews prior to registering a pesticide, it is virtually impossible to identify all conceivable risks and to address all the uncertainties of pesticide use. Therefore, pesticide use should be approached cautiously.

2) Overuse of pesticide can cause problems. Aside from the potential for toxic effects to people, overuse of pesticides may cause problems such as: a) lethal effects to beneficial organisms; b) resurgence of pest populations, and c) contamination of the environment.

3) Economics. An integrated weed management program can result in lower costs than conventional pest management. Some of these poorly accounted for costs are: potential long term health effects, effects of pesticides on non-target animals and plants, and the health effects to someone who may be particularly sensitive to a pesticide or pesticides, and any other effects that are not now understood, but will be uncovered over time. Even though these costs are not traditionally considered in economics, they are costs, and should not be ignored.

We recommend that the DEIS disclose if BLM is pursuing management strategies beyond chemical and mechanical; and if they are, then what these strategies might be. We also recommend that the approach of an integrated weed management program be adaptive. This means that as new information becomes available, it can be incorporated into corrective decisions to revise vegetation management plans.

Herbicides

Herbicide use affects ecosystem processes and, specifically, biological processes. Unintended environmental impacts do occur. The EIS should address the sublethal effects of herbicides, surfactant and emulsifiers on ESA-listed species. The EIS should explore the impacts from non-specific or broad-based herbicides that kill many species of plants and can devastate ecological chains, adversely affecting both terrestrial and aquatic species directly (plant) and indirectly (animal). While the focus is generally on water pathways and drift during chemical application, wind erosion of soils can transport herbicides offsite and have unintended effects, especially on dry, highly erosive BLM lands in the West. In Idaho, a recent application of the herbicide OUST® on BLM lands was unintentionally carried via windblown sediment to nearby agricultural lands, and ended up damaging literally tens of millions of dollars worth of crops. Similarly, the EIS should consider that dust can also be deposited in streams, lakes, and wetlands.